Nisqually Transmission Line Relocation Project

Revision Sheet for the Environmental Assessment
Finding of No Significant Impact
Mitigation Action Plan

DOE/EA-1485
Bonneville Power Administration

January 2005
Summary

This revision sheet documents the changes to be incorporated into the Nisqually Transmission Line Project Preliminary Environmental Assessment (EA). With the addition of these changes, the Preliminary EA will not be reprinted and will serve as the Final EA.

On October 18, 2004, the Preliminary EA was sent to agencies and interested parties. Notification that the EA was available and how to request a copy was sent to all others on the mailing list of potentially affected parties. Comments on the Preliminary EA were accepted until November 26, 2004. Three people commented during the comment period and two people commented after the comment period closed. Please see the Public Comments section for the comments and responses to those comments. There were no revisions to the EA necessary due to public comments.

Revisions to the EA

There are no significant changes to the EA.

Please note that there has been a change in the width of land Fort Lewis would grant by permit to Bonneville Power Administration (Bonneville) for the Proposed Action transmission lines. In the Preliminary EA, Bonneville proposed to obtain a 250-foot-wide right-of-way. The right-of-way width has been expanded to 375 feet for ease of the permit and management responsibilities between Fort Lewis and Bonneville. This expansion will not change the project or its impacts (e.g. location of the towers, number of trees cut, management of the danger tree clearing area, etc.). Because changing the width of the permitted right-of-way does not change environmental impacts, the EA text was not revised to reflect the change. Therefore, any reference to the Proposed Action “right-of-way” within the EA refers to the 250-foot wide area beneath the lines that is necessary for safe operation. The total 375-foot permitted right-of-way will include the 250-foot cleared area plus a 125-foot danger-tree clearing area along the Fort Lewis boundary. (Please see changes to Figure 6 for a graphic representation of the right-of-way.)

Text changes are organized by the chapters and sections of the Preliminary EA. For each change, the location of the change is identified by page and paragraph number of the Preliminary EA. Where text has been modified, deleted text is indicated in “strikethrough” format and new text is underlined.
Chapter 2

Transmission Towers

Page 2-3, paragraph 4 has been modified as follows:

The **lattice-steel** towers would be the same tower type that is used on much of the existing lines and would be 70- to 120-feet tall (depending on the terrain). The towers would have four footings with a total footprint of about 50-feet by 50-feet (0.06 acre). For most of the towers the metal legs of the tower would go directly into the ground, and each one attaches to a grillage footing. A trackhoe would be used to excavate an area about 7 to 13-feet deep, and about 8 to 12 feet in diameter for each footing; all soil and rock removed during excavation would be used to backfill the areas once the footings were installed. A few towers that would require more strength (at corners, etc.) could have concrete footings, with augured holes for each footing. To assemble and erect the towers, an area about 150-feet by 150-feet (0.5 acre) would be disturbed at each tower site for construction equipment maneuvering, tower assembly, etc.

Right-of-way and Tree Clearing

Page 2-4, paragraphs 5, 6, and 7 have been modified as follows:

Bonneville would obtain a permit from Fort Lewis for a 250-375-foot wide right-of-way for the two transmission lines. The north-eastern right-of-way edge would be located 125 feet from the edge of on the Fort Lewis property line. The poles or towers of the northern most line would be placed about 185 feet from the edge of the property. (See Figure 6.)

The 250-foot wide area under the lines and within the right-of-way would require all tall-growing vegetation to be cut (about 63 acres) to prevent vegetation from coming close enough to the conductor to cause an electrical arc (which could injure people, start fires, and put the line out of service).

On either side of the 250-foot wide cleared area right-of-way, danger trees (i.e., trees from the area next to the right-of-way cleared area that could potentially grow, fall, or bend close enough to the lines to cause an electrical arc) also would need to be cut. Based on the height of trees in this area, about half of the trees within about 125 feet of either side of the right-of-way cleared area would need to be removed (up to 36 acres). To selectively identify danger trees for the initial clearing, Bonneville and Fort Lewis foresters would measure the tree height, stability, growth rate and other factors.
Page 2-5, Figure 6, Proposed Action Right-of-way has been modified to illustrate the change in the proposed permit right-of-way width. It also shows steel poles instead of lattice steel towers as follows:

![Proposed Action Right-of-way](image)

**FIGURE 6**
Proposed Action Right-of-way

**Chapter 3**

**Vegetation**

Page 3-7, new text has been added after the bullet item 3 as follows:

- Manage slash from tree clearing by piling, pile and burning, or lop and scattering, as appropriate.

Page 3-7, bullet item 6 has been modified as follows:

- Break up compacted soils at tower sites by tilling and scarifying soils, if necessary, before re-seeding.

Page 3-7, new text has been added after the bullet item 9 as follows:

- Limit work area, including vehicle traffic, to a 200’ x 100’ area around tangent structures, and 200 x 200 at dead-end structures.
Page 3-7, new text has been added after the bullet item 10 as follows:

- Apply herbicide to freshly cut maple stumps within newly cleared right-of-way to prevent resprouts.

Page 3-7, new text has been added after the bullet item 10 as follows:

- Designate truck and equipment parking areas on roads to limit crushing of vegetation and other off-road disturbance.

**Wildlife**

Page 3-15, bullet item 2 has been modified as follows:

- Limit removal of forest habitat to those trees that would interfere with or pose a potential hazard to transmission lines, access roads, or the construction and upgrade of access roads.

Page 3-15, bullet item 5 has been modified as follows:

- Restrict helicopters from flying areas east of the existing transmission line right-of-way, specifically the Nisqually River area.
- Maintain helicopter altitudes no less than above 1,300 feet above ground level until over the project area pursuant to Fort Lewis regulations (IAW FL Reg. 420-5).

**Geology and Soils**

Page 3-19, bullet items 1 and 7 have been replaced as follows, because a Storm Water Prevention Plan is not necessary for this project since there are no water bodies in the project area:

- Prepare a Storm Water Prevention Plan.
- Install sediment barriers and other suitable erosion and runoff control devices prior to ground-disturbing activities at construction sites along Phase I to minimize off-site sediment movement.
- Assess each tower to determine appropriate Best Management Practices (BMPs) for erosion control.

Page 3-19, bullet item 8 has been modified as follows:

- Leave erosion and sediment control devices in place and monitor their effectiveness until the site becomes stable. Maintain BMPs for proper function.

Page 3-19, bullet item 10 has been modified as follows:

- Design access roads to control runoff and prevent erosion by using low grades, outsloping, intercepting dips, water bars, culverts, or ditch-outs.

Page 3-19, bullet item 11 has been modified as follows:

- Rock all new and existing access roads to prevent erosion and rutting.
Page 3-19, bullet item 12 has been modified as follows:

- Re-vegetate or seed. Seed all disturbed areas with a native (where possible) plant/grass seed mixture suited to the site, to promote re-vegetation that will hold soil in place.

Page 3-19, bullet item 13 has been modified as follows:

- Break up compacted soils at tower sites, if necessary, by tilling or scarifying before re-seeding.

Page 3-19, new text has been added after the bullet item 15 as follows:

- Contain any extra concrete or water contaminated with concrete and dispose of appropriately.

**Public Health and Safety**

Page 3-52, bullet item 2 has been modified as follows:

- During construction, the contractors will hold crew safety meetings as appropriate at the start of each workday to go over potential safety issues and concerns.

Page 3-58, bullet item 3 has been modified as follows:

- Drive all construction vehicles at low speeds (5 mph) to minimize dust, if necessary.

**Public Comment**

This section presents comments received on the Preliminary EA and responses to those comments.

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**Response to comment 001, phone call, John Kelly, Olympic Region Clean Air Agency**

Bonneville does not anticipate the need to burn slash as part of this project. Limbs and branches from tree cutting would either be lopped and scattered within the right-of-way and danger-tree areas or piled. If burning is required, appropriate permits would be obtained and we will contact the Olympic Region Clean Air Agency.
Response to comment 002, e-mail, Don Coats, Puyallup Tribe

Mr. Don Coats is on the mailing list for this project because we have you listed as one of the allottee owners of a piece of property adjacent to the Nisqually Indian Tribe. As part of the proposed action, two Bonneville transmission lines that are located on this property are being proposed for relocation.
December 1, 2004

Nisqually Project Comments
Bonneville Power Administration
Communications Office – DM-7
P.O. Box 14428
Portland, OR 97293-4428

Re: Nisqually Transmission Line Relocation Project

To whom it may concern:

I am writing on behalf of the 5,400 members of the Seattle Audubon Society. Seattle Audubon is the oldest environmental organization in the Puget Sound region. We have advocated for the protection of birds, wildlife and their habitat since 1916 through a variety of tools including citizen science, lobbying, legislation, cooperative partnerships and coalitions and litigation.

I am writing to oppose the destruction of any Northern Spotted Owl habitat within the proposal to move transmission lines in the area bordering Fort Lewis and the Nisqually Indian Reservation. Northern Spotted Owls, a federally listed species under the Endangered Species Act, have declined by approximately 50% in the last ten years alone in Washington State. Further habitat destruction, including habitat that is not currently occupied by nesting owls, could lead to the extirpation of this species from Washington.

Habitat destruction may not only be illegal under the Endangered Species Act, but also a gross violation of the duties and responsibilities of public agencies. While the amount of acreage may seem insignificant, this area is critical for the genetic viability of this species. These areas serve as important corridors for owls between the Cascades and Olympics. If Spotted Owls are increasingly isolated on the Olympic Peninsula, then those owls may be doomed to extirpation due to their physical isolation and lack of genetic variability.

We respectfully request you to reconsider the construction of a transmission line through any Spotted Owl habitat. I am happy to answer any specific questions, engage further in this dialogue or meet with interested parties, but we firmly oppose any further Northern Spotted Owl habitat destruction.

Thank you,

Alex Morgan
Conservation Program Director
Seattle Audubon Society
(206)-985-6581
Response to Comment 003, letter, Seattle Audubon Society

Thank you for your letter of concern and advocacy for maintaining spotted owl habitat. Bonneville and Fort Lewis are working with the U.S. Fish and Wildlife Service through the Endangered Species Act, Section 7 consultation process to mitigate effects to designated habitat due to the proposed action. The designated habitat that would be affected is on the edge of 17,000 acres of designated spotted owl critical habitat managed by Fort Lewis. Recent spotted owl surveys found no presences of spotted owls in this area, but found that barred and great horned owls (competitors and predators of spotted owls) are present.

To mitigate for the 236 acres of designated habitat that would be removed for the proposed action, 400 acres of habitat with similar qualities would be managed as spotted owl habitat. The 400 acres are surrounded by Fort Lewis’ 17,000-acre designated spotted owl area and are presently owned by Thurston County and used for timber production. Managing the 400 acres in a similar manor to the designated habitat will reduce patchiness of the existing habitat and preserve existing trees that would otherwise be harvested.

In addition to the protection and management of 400 acres of habitat, Bonneville would provide habitat piles, leave large logs along the edge of the forested stand for habitat enhancement, and replant seedlings within the danger-tree clearing areas (just outside of the required clearance areas).

With the combination of these measures, Bonneville believes that the overall potential spotted owl habitat would be protected and enhanced. These measures would ensure the continuance of the habitat corridor between the Olympic Peninsula and Cascade populations of northern spotted owl. As you noted in your comment letter, this corridor is crucial for the potential exchange of genetic material between the two populations.
Response to Comment 004, phone call, Jim Needham

The proposed action transmission lines would be located on Fort Lewis property with the placement of the closest line about 185 feet from the Fort Lewis-Needham property boundary. Property values can be affected when lines cross a property and impede its use. However, the lines will not encumber the Needham property and the line placement was proposed to ensure that no trees would need to be cut on adjacent properties, including the Needham property.

Corona-generated noise from the transmission lines is estimated to be about 50dBA at about 62 feet from the centerline. Because the closest building on the Needham property would be about 500 feet from the centerline, it is very unlikely that lines would be heard from that distance.

If you have additional questions as the process proceeds, please feel free to contact us.
Response to Comment 005, letter, Squaxin Island Tribe

Thank you for taking time to review the EA. We will continue to consult with the Nisqually Tribe.